

Privacy Notice for Candidates v1.1

Title	Family Leave Policy		
Author	Tom Pearson		
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Revision Version	Reviewer	Date	Reason/Changes
V1.0	Paul Motley	01/01/2021	Original Creation as "Privacy Notice for Prospective Employees"
V1.0	Paul Motley	01/03/2024	Review - no changes
V1.1	Tom Pearson	15/06/2026	Update, restructure and re-write in line with changes

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Policy

Purpose of this Notice

This Privacy Notice explains how Twenty7tec Ltd (“Twenty7tec”, “we”, “us”, or “our”) collects, uses, and protects personal data relating to individuals who apply for roles with us or who we otherwise consider for employment.

It applies to:

- Job applicants
- Individuals identified as potential candidates (e.g. via professional platforms)
- Participants in recruitment events or assessment processes

This notice is provided in accordance with the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018.

Who We Are (Data Controller)

Twenty7tec Ltd is the **data controller** for recruitment activities.

Registered Address: Avalon, Suite A, 7th Floor, Bournemouth BH8 8EZ

Data Protection Lead: Tom Pearson, Director of People Operations

Contact: security@twenty7tec.com

What Personal Data We Collect

Data you provide directly

We may collect:

- Identification data (name, address, email, telephone number)
- CV and application data (employment history, qualifications, skills, and interests)
- Salary information (current salary and expectations)
- Interview and assessment data (interview notes, technical assessments, written exercises)
- References (contact details and feedback)
- Job preferences and availability
- Communications with us

Data from other sources

We may obtain your personal data from:

- Recruitment platforms (e.g. LinkedIn or similar professional networks)
- Referees (with your knowledge)
- Background screening and identity verification providers (e.g. Amiqus)
- Publicly available professional information

We may also proactively identify and engage potential candidates based on publicly available professional profiles.

Special Category Data

We do not routinely request special category data (such as health or ethnicity). However, this type of data may be processed where:

- You choose to provide it
- It is required to make reasonable adjustments during the recruitment process
- It is required for legal or regulatory purposes (e.g. right to work checks or equality monitoring)

Where we process special category data, we rely on appropriate conditions under Article 9 UK GDPR, such as employment law obligations or explicit consent where applicable.

How We Use Your Personal Data

We process your personal data for the following purposes:

- Managing our recruitment and selection processes
- Assessing your suitability for a role
- Communicating with you regarding your application
- Conducting interviews and assessments
- Verifying information provided, including references
- Conducting background checks (post-offer and prior to employment start)
- Identifying candidates for current and future opportunities
- Complying with legal and regulatory obligations
- Protecting our business, people, and systems from fraud or misuse

We may also retain and reconsider your application for future roles where appropriate.

Lawful Basis for Processing

We rely on the following lawful bases under UK GDPR:

Purpose	Lawful Basis
Assessing applications and progressing recruitment	Article 6(1)(b) – steps prior to entering into a contract
Managing recruitment processes and internal hiring activity	Article 6(1)(f) – legitimate interests
Background checks (post-offer)	Article 6(1)(f) and/or Article 6(1)(c)
Talent pool retention	Article 6(1)(a) – consent
Legal compliance and record keeping	Article 6(1)(c)

Where we rely on legitimate interests, we have carried out assessments to ensure our processing is necessary, proportionate, and does not override your rights and freedoms.

Legitimate Interests – Further Detail

Our legitimate interests include:

Fair, consistent and effective recruitment

- Assessing candidates using structured, role-specific evaluation criteria
- Using scoring matrices and multi-reviewer input across People Operations, hiring managers, and senior stakeholders
- Ensuring recruitment decisions are objective, evidence-based, and non-discriminatory

Why this is necessary: To recruit suitable candidates and ensure fair and consistent hiring decisions.

Impact on individuals: Limited and expected as part of applying for employment. All decisions involve human oversight.

Managing recruitment processes and operations

- Coordinating recruitment activities across internal stakeholders
- Managing communications, interviews, and feedback
- Using systems such as HiBob to organise and manage candidate data

Why this is necessary: To run an efficient and structured recruitment function.

Impact on individuals: Low and within reasonable expectations for a recruitment process.

Maintaining records and defending legal claims

- Retaining recruitment records and assessment outcomes
- Maintaining audit trails of hiring decisions
- Demonstrating fairness and compliance in recruitment

Why this is necessary: To meet legal obligations and defend potential claims (e.g. discrimination or employment disputes).

Impact on individuals: Minimal, with defined and proportionate retention periods.

Identifying and engaging potential candidates

- Reviewing publicly available professional profiles (e.g. LinkedIn)
- Proactively contacting individuals with relevant skills or experience

Why this is necessary: To identify suitable candidates and support business growth.

Impact on individuals: Limited to professional information. Individuals may disengage or opt out at any time.

Re-contacting candidates for future opportunities

- Considering previous candidates for similar roles
- Re-engaging candidates where recruitment outcomes change
- Contacting suitable candidates for future roles where appropriate

Why this is necessary: To improve recruitment efficiency and avoid unnecessary duplication of processes.

Impact on individuals: Low and limited to candidates who would reasonably expect further contact.

Protecting our business and preventing misuse

- Verifying identity and right to work (e.g. using Amiqus)
- Identifying fraudulent or misleading applications
- Protecting recruitment systems and processes

Why this is necessary: To protect the organisation, employees, and systems.

Impact on individuals: Proportionate and appropriate, with checks carried out at the appropriate stage (post-offer).

Safeguards Applied

We apply the following safeguards across all legitimate interest processing:

- Human oversight in recruitment decisions
- Role-based access controls
- Transparent communication via this Privacy Notice
- Defined retention and deletion controls
- Supplier due diligence and contractual protections

Automated Processing

We may use recruitment systems (including HiBob) that include automated features such as filtering or organising candidate data.

However:

- No decisions are made solely by automated means
- All recruitment decisions involve human review

Sharing Your Personal Data

Internal recipients

Your data may be accessed by:

- Hiring managers
- People / HR team
- Relevant stakeholders involved in recruitment

External providers (processors)

We use carefully selected third-party providers, including:

- HiBob (Applicant Tracking System and HR platform)
- Amiqus (identity and background verification)
- Potential assessment or psychometric providers (where applicable)
- IT and cloud service providers

All providers are contractually required to:

- Process personal data only on our instructions
- Maintain appropriate organisational and technical security
- Comply with UK GDPR

International Access and Transfers

Your personal data is primarily stored within the UK and EEA.

However, it may be accessed by authorised personnel located outside the UK/EEA. Where this occurs, we ensure appropriate safeguards, including:

- Contractual controls
- Role-based access restrictions
- Secure system access measures

Data Retention

We retain your personal data only for as long as necessary:

- **Unsuccessful applicants (no further consent):** up to 60 days
- **Talent pool candidates (with consent):** up to 24 months
- **Successful applicants:** retained as part of employment records

Retention periods are based on:

- Business and recruitment needs
- Legal and regulatory obligations
- The need to defend potential legal claims

You may withdraw consent to future contact at any time.

Your Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data
- Restrict or object to processing

INTERNAL

- Request transfer of your data (data portability)
- Withdraw consent where applicable

To exercise your rights, please contact us at: security@twenty7tec.com

We will respond within one month.

Complaints

If you are unhappy with how we process your personal data, you have the right to lodge a complaint.

You should first raise your concern with our Data Protection Lead using the following form: [GDPR - Data Protection Complaints - Twenty7tec](#)

If you are not satisfied with the outcome, you have the right to raise a complaint with the Information Commissioner's Office (ICO).

Data Security

We implement appropriate technical and organisational measures to protect your personal data, including:

- Role-based access controls
- Secure cloud-based systems
- Staff training and confidentiality obligations
- Supplier due diligence and contractual safeguards

Changes to this Notice

We may update this Privacy Notice from time to time. The latest version will always be available on our website.